

**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

January 22, 2008

1/23/08

**BY FACSIMILE:** (212) 805-6326  
The Honorable Colleen McMahon  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**

*OK*  
*Time Excluded*  
*through 2/21/08.*

**Re: United States v. Mutholib Sanni and Francia Tabares  
07 Cr. 999 (CM)**

Dear Judge McMahon:

The Government respectfully submits this letter, after speaking with Your Honor's Deputy, to request jointly with the defense an adjournment of the pre-trial conference currently scheduled for January 24, 2008, at 9:30 a.m., to February 21, 2008, at 9:30 a.m.

The Government also respectfully requests that time be excluded for purposes of the Speedy Trial Act from today through February 21, 2008. The Government makes this request, with the consent of defense counsel, to permit the defense to review discovery, for the Government and the defense to pursue discussions regarding a possible disposition before trial, and to accommodate the schedule of defense counsel.

<b>USDS SDNY</b>
<b>DOCUMENT</b>
<b>ELECTRONICALLY FILED</b>
DOC #: _____
DATE FILED: <u>1/23/08</u>

Respectfully submitted,

**MICHAEL J. GARCIA**  
United States Attorney

By:

*[Signature]*  
**Eugene Ingoglia**  
Assistant U.S. Attorney  
(212) 637-1113

cc: Roy Kulcsar, Esq., counsel for Francia Tabares (fax: 201-439-1478)  
John M. Murphy, Jr., Esq., counsel for Mutholib Sanni (fax: 718-448-8685)